

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE, : Civil Action No. 23-cv-10628 (JGLC)
: :
Plaintiff, : DECLARATION OF
: JONATHAN D. DAVIS
: IN SUPPORT OF MOTION
: TO DISMISS UNDER
: FED R. CIV. P. 12(b)(6)
v. :
: :
SEAN COMBS; HARVE PIERRE; THE THIRD :
ASSAILANT; DADDY'S HOUSE RECORDINGS, :
INC. and BAD BOY ENTERTAINMENT :
HOLDINGS, INC., :
: :
Defendants. :
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JONATHAN D. DAVIS declares as follows:

1. I am the sole shareholder of Jonathan D. Davis, P.C., attorneys for Defendants Daddy's House Recordings, Inc. and Bad Boy Entertainment Holdings, Inc. (the "Corporate Defendants").
2. I submit this declaration in support of the Corporate Defendants' motion under Fed. R. Civ. P. 12(b)(6) for an order dismissing the Complaint [Dkt. No. 1].
3. Attached as Exhibit A is a true and correct copy of an excerpt of the New York City Council's Legislation Text for Introduction No. 1012-A, Local Law No. 2018/063, which provides, *inter alia*, the language of N.Y.C. Admin. Code § 10-1104, effective prior to January 9, 2022.
4. Attached as Exhibit B is a true and correct copy of the New York City Council's Legislation Text for Introduction No. 2372-B, Local Law No. 2022/021, which provides, *inter alia*, the language of N.Y.C. Admin. Code § 10-1104, effective as of January 9, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed at New York, New York, on this 20th day of February 2024.

/s/Jonathan D. Davis

JONATHAN D. DAVIS